

## **REMARKS**

Reconsideration of this application, based on this amendment and these following remarks, is respectfully requested.

Claims 1 through 24 remain in this case. Claims 1, 12, 13, 18, and 19 are amended.

Claims 1 through 3, 5, 10 through 16, 18, and 22 through 24 were rejected under §103 as unpatentable over the Naden reference<sup>1</sup> in view of the Lee reference<sup>2</sup>. Claims 6 and 19 were rejected under §103 as unpatentable over the Naden and Lee references, further in view of the Lemilainen et al. reference<sup>3</sup>. Claims 7 through 9, 20, and 21 were rejected under §103 as unpatentable over the Naden and Lee references, further in view of the MacAuley et al. reference<sup>4</sup>. Claims 4 and 17 were rejected under §103 as unpatentable over the Naden and Lee references, further in view of Official Notice taken by the Examiner regarding XML data.

More specifically, the Examiner rejected claim 1 (and, on similar grounds, claim 12) on the basis that the Naden reference teaches all of the elements of the claim, except for explicitly teaching that the data transferred by its PDA to the projection system includes HTML commands. The Examiner found that the Lee reference teaches an LCD projector that receives Internet image signals from a user PC for display, and that it would have been obvious to the skilled artisan to have combined these teachings into the Naden system to permit Internet content viewed on the PDA to be sent to the projector. Claim 1 was rejected accordingly, as was claim 12, with the additional limitations of the dependent claims found in the Naden reference or one of the other references of record or using Official Notice.

Claim 1 is amended to clarify its patentability over the prior art, and for clarity. Amended claim 1 now requires that the access device is operable to wirelessly access content comprising HTML commands from a server via the Internet, and also to locally wirelessly transmit that content. The radio frequency receiver of the display device is clarified to recite that the content

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<sup>1</sup> U.S. Patent No. 7,057,635 B1, issued June 6, 2006 to Naden, from an application filed January 27, 2000.

<sup>2</sup> U.S. Patent No. 6,337,769 B1, issued January 8, 2002 to Lee, from an application filed December 6, 1999.

<sup>3</sup> U.S. Patent No. 6,681,239 B1, issued January 20, 2004 to Lemilainen et al.

<sup>4</sup> U.S. Patent No. 6,663,560 B2, issued December 16, 2003 to MacAuley et al.

it receives comprises HTML commands, consistently with the recitation in the access device element. No new matter is presented by this amendment to claim 1, considering the clear teachings in the specification.<sup>5</sup>

The system of amended claim 1 provides important advantages over the prior art, by enabling Internet-stored content to be accessed in a remote location by an access device such as a PDA, cell phone, or the like, for display to a larger group by way of a projection system and the like. According to this invention, the content need not be stored by the PDA or cell phone itself, but need only be accessible over the Internet; furthermore, because the content acquired by the access device is transmitted to the projection system by way of HTML commands and compressed files, rather than as full video and graphics as if the projection system were a display for the access device, the bandwidth requirements for the local wireless link and the computational capacity of the access device are much reduced.<sup>6</sup>

Applicants submit that amended claim 1 and its dependent claims are patentably distinct over the references applied by the Examiner. Specifically, Applicants submit that the combined teachings of the references fall short of teaching or suggesting an access device that wirelessly accesses Internet content comprising HTML commands, and that then locally wirelessly transmits that content for receipt and processing by a display device, as claimed.

The Examiner asserted that the Naden reference teaches a PDA that wirelessly accesses the Internet, such that it would have been obvious for it to access and then transmit accessed content including HTML commands to its projection system.<sup>7</sup> Applicants disagree, and submit that these teachings do not reach the requirements of the access device now required by amended claim 1. Specifically, the cited location of the Naden reference reads:

The MAC 34 is also able to connect individual conferees at the PDA's 4 *a* - 4 *c* to each other for private data transfers. The MAC 34 also enables connection of any conferee to a nearby wired network, e.g. Ethernet, by means of a wired cable 18 (or alternatively an RF link) from the projection system 10 to a local Ethernet connection. Alternatively, this Ethernet connection itself may be made wirelessly

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<sup>5</sup> Specification of S.N. 09/802,353, as published as U.S. Patent Application Publication No. US 2001/0054114 A1, paragraphs [0014] and [0015].

<sup>6</sup> Specification, *supra*, paragraph [0003].

<sup>7</sup> Office Action of July 16, 2007, page 3, *citing* Naden, *supra*, column 4, lines 60 through 67.

as part of this invention where the Ethernet access point is configured like another mobile user and connected to the central MAC 34 inside the projection system 10.<sup>8</sup>

As evident from this portion of the reference, it is the disclosed element of the MAC 34 that accesses network elements, which the Examiner asserted to be the Internet. However, the MAC 34 of the Naden system is in the projection system 10, and not in the PDA or other access device.<sup>9</sup> Accordingly, if Internet access is permitted to the users of the Naden system, that access would be carried out by the projection system (via its wired cable 18 or an RF link). Therefore, the Naden reference does not disclose an access device that wirelessly accesses content comprising HTML command from a server via the Internet and then locally wirelessly transmits that content to the projection system. The Naden reference falls short of the requirements of amended claim 1 in this regard.

And because the Lee reference also lacks teachings regarding this wireless Internet access by the access device,<sup>10</sup> Applicants submit that the combined teachings of the references fall short of the requirements of claim 1 and its dependent claims.

In the alternative, even assuming *arguendo* that the PDAs of the Naden system can access the Internet via MAC 34 of the projection system, Applicants submit that there is no suggestion from the prior art to combine the Lee teachings regarding HTML commands with those of the Lee reference to reach the requirements of amended claim 1. If the PDAs of the Naden system can access the Internet via the projection system 10, the skilled reader would have no reason to build or operate this system so that the accessed Internet content, including HTML commands etc., would be downloaded into the MAC 34 of the projection system, forwarded wirelessly to the PDAs, and then wirelessly transmitted *back* from the PDAs into the projection system for display. But this is what modification of the Naden system in the manner asserted by the Examiner would require, in order to reach amended claim 1, because the Naden reference teaches Internet access through the projection system, and not by the PDAs. In contrast, the access device of the claimed system wirelessly accesses content comprising HTML commands

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<sup>8</sup> Naden, *supra*, column 4, lines 60 through 67.

<sup>9</sup> Naden, *supra*, column 3, line 62 through column 4, line 3.

<sup>10</sup> As do the other applied references.

from a server via the Internet, and then locally wirelessly transmits that content for receipt by the display device. Applicants submit that the skilled reader, even if motivated to combine the Naden and Lee references as urged by the Examiner, simply would not be motivated to forward the HTML content wirelessly from the projection system to the PDA, only to then wirelessly transmit that content back to the projection system from whence it came.

This interpretation of the limitations of the PDAs in the Naden reference is consistent with the reference itself, in which it is the content stored on the PDAs themselves (*i.e.*, and not acquired from a remote location, such as a server accessed via the Internet) that is forwarded to the projection system of the Naden reference for display.<sup>11</sup> Rather, as pointed out at this location of the reference, its PDA includes a mass memory unit for storing user data including presentation data. There is no mention whatsoever of these PDAs of the Naden system accessing the Internet, much less forwarding HTML commands and other content from such Internet access to the projection system.

These differences between the system of amended claim 1 and the prior art directly provide important advantages over the prior art. As pointed out in the specification, the claimed system enables the generation and remote Internet-accessible storage of presentations and other content to be shown at remote locations and to groups. Using the claimed system, the presenter need not carry a copy of the presentation in his own device;<sup>12</sup> rather, via Internet access of the server storing the presentation, the presenter can download the HTML content to the display device for display to the group. Indeed, it is contemplated that the Internet-stored content can be edited and updated by others or automatically, for display upon access via the access device. These advantages stem directly from the differences between the claimed system and the prior art, especially considering that the Naden reference teaches only the display of content stored on the PDA of its system.

Applicants therefore respectfully submit that amended claim 1 and its dependent claims are patentably distinct over the Naden and Lee references, as well as the other prior art of record in this case.

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<sup>11</sup> Naden, *supra*, column 3, lines 54 through 61.

<sup>12</sup> In contrast to the system of the Naden reference.

Claim 12 is similarly amended to clarify its patentability over the applied references. Amended claim 12 now recites the additional step of operating an access device to access a server via the Internet, and that the step of receiving network content receives that content from the accessed server. No new matter is presented by this amendment to claim 12.<sup>13</sup> Claims 13, 18, and 19 are amended for consistency with the amendment to claim 12, upon which they depend.

Applicants submit that amended claim 12 and its dependent claims are patentably distinct over the references applied by the Examiner, for similar reasons as discussed above relative to claim 1. The combined teachings of the applied references fall short of teaching or suggesting the operating of an access device to access a server via the Internet, the receiving of content from that accessed server in the form of HTML commands, and the transmitting of those HTML commands to a display device, followed by the interpreting of those commands and the displaying of pixel data generated therefrom at the display device, as claimed.

As mentioned above, claim 12 was rejected on a similar basis as claim 1.<sup>14</sup> This rejection is based on the assertion that the Naden reference teaches a PDA that wirelessly accesses the Internet, and that the Lee reference teaches an LCD projector that receives Internet image signals, such that it would have been obvious to combine these references to reach the method of claim 12, by way of which the PDA access the Internet to obtain content that is then displayed by the projection system.<sup>15</sup>

Applicants submit that the Naden and Lee references cannot be combined in this manner. As urged above relative to claim 1, Applicants submit that the only network access taught by the Naden reference is by the projection display system; there is no teaching or suggestion in the reference regarding access of the Internet directly by the PDAs of the reference.<sup>16</sup> Because it is the MAC 34 of the Naden reference that accesses external network elements, any Internet access suggested by the Naden reference would be carried out by the projection system (via its wired cable 18 or an RF link). Strictly combining the Naden reference (as interpreted in this manner,

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<sup>13</sup> Specification, *supra*, paragraphs [0014] and [0015].

<sup>14</sup> Office Action, *supra*, page 4.

<sup>15</sup> Office Action of July 16, 2007, page 3, *citing* Naden, *supra*, column 4, lines 60 through 67.

<sup>16</sup> See Naden, *supra*, column 4, lines 60 through 67.

for the sake of argument) with the Lee teachings asserted by the Examiner would result, at best, in the projection system of the Naden reference accessing the Internet and downloading content, and the projection system wirelessly forwarding that downloaded Internet content to a PDA, which in turn wirelessly transmits the Internet content back to the projection system. This operating method makes little sense; Applicants therefore submit that the skilled reader of these references would have no motivation to make this combination.

Nor is there any suggestion to modify these combined teachings in such a manner as to reach amended claim 12. This lack of suggestion is especially apparent that the PDAs of the Naden reference fully store the content that is to be displayed by the projection system. The Naden reference teaches that its PDAs include a mass memory unit for storing user data including presentation data.<sup>17</sup> There is no mention whatsoever that these PDAs access the Internet, much less receive and transmit HTML commands and other content from such Internet access to the projection system. Nor, in the general sense, is there any teaching or suggestion from the Naden reference, nor the other prior art of record, to acquire HTML content from a remote location, such as a server accessed via the Internet, and then forward *that* content to the projection system of the Naden reference for display.<sup>18</sup>

For these reasons, Applicants submit that the combined teachings of the Naden and Lee references fall short of the requirements of the claims. Nor do the other references provide any teachings sufficient to make up this shortfall.

The differences between the system of amended claim 12 and the prior art directly provide important advantages over the prior art, similarly as in the case of amended claim 1. The method of claim 12 enables the creation and editing of content that can be remotely accessed and displayed, for example over projection display systems at a customer location, simply through Internet access executed by a PDA, cell phone, or other portable Internet-capable access device. And because the content includes HTML commands, rather than video pixel data, the bandwidth required for local transmitter between the access device and the display device is conserved, by taking advantage of the computational capacity at the display device.

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<sup>17</sup> Naden, *supra*, column 3, lines 54 and 55.

<sup>18</sup> Naden, *supra*, column 3, lines 54 through 61.

Applicants therefore respectfully submit that amended claim 12 and its dependent claims are patentably distinct over the Naden and Lee references, as well as the other prior art of record in this case.

For these reasons, Applicants respectfully submit that all claims now in this case are in condition for allowance. Reconsideration of the above-referenced application is therefore respectfully requested.

Respectfully submitted,  
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